

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RICE

THIRD JUDICIAL DISTRICT

Daniel Ludwig,

Case Type: Personal Injury

Court File No.:

Plaintiff,

v.

**AFFIDAVIT OF  
RICHARD J. SCHROEDER  
PURSUANT TO  
MINN. STAT. §169.09, SUBD. 16**

Don Hummer Trucking Corporation, and  
Joseph William Welch,

Defendants.

STATE OF MINNESOTA    )  
                                  )ss  
COUNTY OF RAMSEY    )

Richard J. Schroeder, being duly sworn on oath, states as follows:

1. Your Affiant is an attorney licensed to practice law in the State of Minnesota.
2. Your Affiant is a partner with the law firm, Schroeder & Mandel, PA, who represents the Plaintiff in the above-referenced matter.
3. Your Affiant has diligently attempted to locate the Defendant, Joseph William Welch. Upon information and belief, the Defendant does not reside in the State of Minnesota. The Defendant's last known address is 1252 E. 17<sup>th</sup> Court, Des Moines, Iowa 50316-2606.
4. That your Affiant has complied with all of the requirements under Minn. Stat. §169.09, Subd. 16 and has served the Summons and Complaint (w/Exhibit A) upon the Minnesota Commissioner of the Department of Public Safety. See Exh. 1.
5. That your Affiant pursuant to Minn. Stat. §169.09, Subd. 16 has mailed to the Defendant at the Defendant's last known address the following documents:
  - Summons and Complaint (with Exhibit A);
  - Copy of this Affidavit attached to the Summons.

See Exh. 2.


6. As such, your Affidavit has complied with the requirements of Minn. Stat. §169.09, Subd. 6.

FURTHER YOUR AFFIANT SAYETH NOT

Dated:

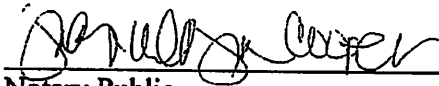
July 22<sup>nd</sup>, 2020

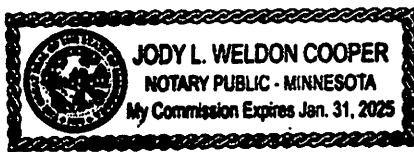
By

  
Richard J. Schroeder, #231629  
SCHROEDER & MANDEL, PA  
219 Little Canada Road E, Suite 200  
St. Paul, MN 55117  
Telephone: (651) 426-8740  
Facsimile: 877-822-3312  
Email: [rick@schroederandmandel.com](mailto:rick@schroederandmandel.com)

ATTORNEYS FOR PLAINTIFF  
DANIEL LUDWIG

Subscribed and sworn to before me  
this 22nd day of July, 2020.

  
Notary Public



STATE OF MINNESOTA       )  
  ) ss.  
COUNTY OF RICE        )

---

Court File #

Daniel Ludwig,  
                                  Plaintiff(s),

vs.

**AFFIDAVIT OF SERVICE**

Don Hummer Trucking Corporation, and  
Joseph William Welch,  
                                  Defendant(s).

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**PRO LEGAL SUPPORT SERVICES, INC.**

I, Eugene Anderson, state that on July 21, 2020, at 1:55 pm, I served a copy of the Summons and Complaint with Exhibit A in the above entitled action upon Minnesota Commissioner of Public Safety therein named, at 444 Cedar St N., Saint Paul, MN 55101, in the County of Ramsey, by handing to and leaving with Alayah Reynolds (Office Administrative Specialist and person who stated she is authorized to accept service of process on behalf of Minnesota Commissioner of Public Safety) true and correct copies thereof.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: July 21, 2020



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Eugene Anderson  
7800 Metro Parkway #300  
Bloomington, MN 55425  
(612) 860-5844  
service@prolegalmn.com

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RICE

THIRD JUDICIAL DISTRICT

Daniel Ludwig,

Case Type: Personal Injury

Court File No.:

Judge:

Plaintiff,

v.

**SUMMONS**

Don Hummer Trucking Corporation, and  
Joseph William Welch,

Defendants.

THIS SUMMONS IS DIRECTED TO DEFENDANT DON HUMMER TRUCKING CORPORATION, 505 33<sup>RD</sup> AVENUE SW, CEDAR RAPIDS, IOWA 52404, AND DEFENDANT JOSEPH WILLIAM WELCH, 1252 E. 17<sup>TH</sup> COURT, DES MOINES, IOWA 50316-2606:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.
2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a written response called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

SCHROEDER & MANDEL, P.A.  
219 Little Canada Road E, Suite 200  
St. Paul, Minnesota 55117

MCEWEN & KESTNER, PLLC  
5854 Blackshire Path  
Inver Grove Heights, Minnesota 55076

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.
4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the

Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond.

A default judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.
6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

SCHROEDER & MANDEL, P.A.

Dated: May 19, 2020

/s/ Richard J. Schroeder

Richard J. Schroeder, #231629  
219 Little Canada Road E, Suite 200  
St. Paul, Minnesota 55117  
Telephone: (651) 426-8740  
Facsimile: 877-822-3312  
Email: rick@schroederandmandel.com

-and-

MCEWEN & KESTNER, PLLC

Dated: May 19, 2020

/s/ Peter J. Kestner

Peter J. Kestner, #0311662  
5854 Blackshire Path  
Inver Grove Heights, Minnesota 55076  
Telephone: (651) 224-3833  
Facsimile: (651) 223-5790  
Email: pete@crawfordkestner.com

ATTORNEYS FOR PLAINTIFF  
DANIEL LUDWIG

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RICE

THIRD JUDICIAL DISTRICT

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Daniel Ludwig,

Case Type: Personal Injury

Court File No.:

Judge:

Plaintiff,

v.

**COMPLAINT**

Don Hummer Trucking Corporation, and  
Joseph William Welch,

Defendants.

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Plaintiff, Daniel Ludwig, for his Complaint against the above-named Defendants, states and alleges:

I.

The Plaintiff, Daniel Ludwig, at all times herein material resides at 1451 130th Street E, City of Dundas, State of Minnesota, 55019.

II.

That Defendant, Don Hummer Trucking Corporation (hereinafter, "Don Hummer Trucking") is an Iowa corporation with its principal place of business at 505 33<sup>rd</sup> Avenue SW, City of Cedar Rapids, County of Linn, State of Iowa, however, Defendant does business throughout the State of Minnesota, including Rice County.

III.

That Defendant, Joseph William Welch, whose current whereabouts are unknown, at all times material was last known to be residing at 1252 E. 17<sup>th</sup> Court, City of Des Moines, State of Iowa, 50316-2606.

## IV.

On January 10, 2017, Plaintiff Daniel Ludwig was driving a 2006 STE snow plow truck, owned and maintained by the State of Minnesota – Department of Transportation, bearing Minnesota license plate number, ET6-078. Plaintiff was traveling northbound in the left lane on ITH 35 in the City of Faribault, State of Minnesota.

## V.

At the aforementioned date and place, Defendant Joseph William Welch, while in the course and scope of his employment with Defendant Don Hummer Trucking Corporation was operating a 2016 Kenworth T660 semi-tractor/trailer, bearing Iowa license plate number, SC2-559, which upon information and belief was also traveling northbound in the left lane on ITH 35, in the City of Faribault, State of Minnesota. As Plaintiff Daniel Ludwig's snow plow truck was traveling northbound in the left lane on ITH 35, the Defendant's semi-tractor trailer, also traveling northbound on ITH 35, in the left lane at about the 57-mile marker, Defendant Joseph William Welch, suddenly and without warning, drove the semi-tractor trailer into the rear of Plaintiff Daniel Ludwig's snow plow truck. Following the impact, the snow plow truck Plaintiff Daniel Ludwig was operating came to a rest on the right shoulder, while the Defendant's semi-tractor trailer careened down into the left median/ditch. See Exh. A. *Minnesota Department of Public Safety – Motor Vehicle Crash Report*.

## VI.

That Defendant Joseph William Welch was operating the semi-tractor trailer that was owned by Defendant Don Hummer Trucking with its permission and operating said semi-tractor/trailer in interstate commerce pursuant to operating rights granted to Defendant Don Hummer Trucking by the FMCSA, numbered 307512.

VII.

At said time and place, Defendant Joseph William Welch illegally, negligently, carelessly and unlawfully caused the semi-tractor he was operating, which was owned and maintained by Defendant Don Hummer Trucking, to collide with the rear of the snow plow truck in which the Plaintiff was operating. As a result, Defendant Joseph William Welch violated Minnesota law in one or more of the following ways:

1. By driving inattentively;
2. By driving while distracted;
3. By failing to keep a proper lookout;
4. By driving too fast for conditions;
5. By failing to keep his vehicle under control in his lane of travel;
6. By operating a vehicle in a careless manner as defined by Minn. Stat. §169.13, Subd. 2; and;
7. In many other ways which will be proven at the time of trial.

VIII.

As a direct and proximate result of the illegal, negligent, careless and unlawful conduct of Defendant Joseph William Welch, Plaintiff Daniel Ludwig sustained in excess of \$48,646.84 in reasonable and necessary medical treatment. Plaintiff continues to treat for his injuries; and according to some of Plaintiff's treating physicians, some of the Plaintiff's injuries are permanent in nature; Plaintiff has incurred lost earnings; and has in excess of 60 days disability, thus satisfying at least one of the tort thresholds as set forth in Minn. Stat. §65B, Subd. 3. Furthermore, Defendant Don Hummer Trucking is vicariously liable for the actions of its driver because the driver was dispatched by Defendant Don Hummer Trucking and operating an interstate commerce under Defendant Don Hummer Trucking's operating authority at the time of the collision.

IX.

As a direct and proximate result of the aforesaid illegal, negligent, careless and unlawful conduct of Defendant Joseph William Welch, Plaintiff Daniel Ludwig has incurred in the past and



will in the future incur expenses for reasonable and necessary medical care and treatment; has in the past and will in the future incur loss of earnings; and as a result, he has in the past and will in the future suffer physical pain and mental harm; and also he has ongoing past and will have future economic losses all to his detriment.

X.

At said time and place and upon information and belief, the Defendant Joseph William Welch was in the course and scope of his employment with Defendant Don Hummer Trucking. As such, pursuant to the doctrine of *respondeat superior*, Defendant Don Hummer Trucking is vicariously liable for the acts and conduct of its employee, Defendant Joseph William Welch. An employer is liable for the negligent act of its employee committed in the course and scope of employment when: (1) the conduct was to some degree in furtherance of the employer's interests; (2) the employee was authorized to perform the type of conduct; (3) the conduct occurred substantially within the employers authorized time and space restrictions; and (4) the employer should reasonably have foreseen the conduct. *Snilsberg v. Lake Washington Club*, 614 N.W.2d 738, 745 (Minn. Ct. App. 2000). Defendant Joseph William Welch's conduct clearly satisfies all four of the above factors.

XI.

In addition to the negligent, careless, illegal and unlawful conduct of Defendant Joseph William Welch, Defendant Don Hummer Trucking, upon information and belief, violated Minnesota law, or is causally negligent in one or more of the following ways:

1. By failing to properly screen, hire, train and/or supervise its employee drivers;
2. By failing to properly maintain and service its commercial vehicles in order to assure the public that they are safe and road-worthy;

3. By allowing its employees to operate its commercial vehicles with faulty equipment;
4. By failing to properly inspect its commercial vehicle before allowing its employee drivers to operate said commercial vehicle on Minnesota's roads and highways; and
5. In many other ways to be proven following discovery and at the time of trial.

XII.

On information and belief and investigation, Defendant Don Hummer Trucking's employee/driver, Defendant Joseph William Welch, had an extensive prior criminal history which included multiple driving violations, such as speeding, failing to secure a child, operating a vehicle without registration, as well as other criminal violations, including, but not limited to, possession of drug paraphernalia, possession of controlled substance, carrying weapons (knife over 5 inches), unlawful possession of prescription drugs, probation violations and supplying alcohol to underage persons. All of these motor vehicle and criminal violations were public record and for which Don Hummer Trucking knew, or should have known, at the time they considered hiring Defendant Joseph William Welch. Said motor vehicle and criminal violations go to the ability of a driver to safely operate a commercial motor vehicle.

XIII.

In addition, at said time and place, the semi-tractor trailer being driven by Defendant Joseph William Welch, was owned by Defendant Don Hummer Trucking. As a result, pursuant to Minn. Stat. §169.09, Defendant Don Hummer Trucking is also vicariously responsible for all of Plaintiff's injuries and damages caused by the operation of said semi-tractor trailer operated by Defendant Joseph William Welch.

XIV.

At said time and place of the motor vehicle collision with Defendant Joseph William Welch, Plaintiff Daniel Ludwig was in the course and scope of his employment with the Minnesota Department of Transportation, who is self-insured. Pursuant to Minnesota law, Plaintiff Daniel Ludwig's employer/insurer paid certain worker's compensation benefits. As such, pursuant to Minn. Stat. §176.061, Subd. 3 and 6, Plaintiff Daniel Ludwig's employer/insurer have a right of indemnity and therefore are subrogated to any recovery the Plaintiff Daniel Ludwig receives as a result of Defendants Don Hummer Trucking and Joseph William Welch's negligence.

WHEREFORE, Plaintiff Daniel Ludwig demands judgment, jointly and severally, against the Defendants Don Hummer Trucking Corporation and Joseph William Welch, in an amount in excess of Fifty Thousand and no/100 (\$50,000.00) Dollars together, along with costs, pre-judgment and post-judgment interest and disbursements as allowed by Minnesota law.

PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY.

SCHROEDER & MANDEL, P.A.

Dated: May 19, 2020

/s/ Richard J. Schroeder

Richard J. Schroeder, #231629  
219 Little Canada Road E, Suite 200  
St. Paul, Minnesota 55117  
Telephone: (651) 426-8740  
Facsimile: 877-822-3312  
Email: rick@schroederandmandel.com

-and-

MCEWEN & KESTNER, PLLC

Dated: May 19, 2020

/s/ Peter J. Kestner

Peter J. Kestner, #0311662  
5854 Blackshire Path  
Inver Grove Heights, Minnesota 55076  
Telephone: (651) 224-3833  
Facsimile: (651) 223-5790  
Email: pete@crawfordkestner.com

ATTORNEYS FOR PLAINTIFF  
DANIEL LUDWIG

#### ACKNOWLEDGEMENT

The undersigned acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.211, Subd. 2, to the parties against whom the allegations in this pleading are asserted.

/s/ Richard J. Schroeder

Richard J. Schroeder, Esq.

/s/ Peter J. Kestner

Peter J. Kestner, Esq.

Report ID  
17100175ACN  
170100223Date  
1/10/2017Day Of Week  
TUESDAYTime  
11:09 AMAgency  
MN State Patrol District  
2100 - RochesterMINNESOTA DEPARTMENT OF PUBLIC SAFETY  
MOTOR VEHICLE CRASH REPORTVehicles  
2Injuries  
0Fatalities  
0County  
Rice  
City  
FaribaultHit And Run? ☐Report Amended? ☐Private Property Damage? ☐Public Property Damage? ☐

Id of Occurrence NB Isth 35 MM 57

Latitude 44.29046372

Longitude -93.30881723

UNIT 1 DRIVER				UNIT 2 DRIVER			
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	Last Name WELCH	First JOSEPH	Middle WILLIAM	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	Last Name LUDWIG	First DANIEL	Middle JOHN
City DES MOINES	Address 1252 E 17TH CT	State IA	County Zip 50316	City DUNDAS	Address 1451 130TH ST E	State MN	County Zip 55019
DOB 1/23/1988	Age 28	Driver's License No 546YY4365	Status Valid	DOB 8/7/1970	Age 46	Driver's License No Z816218921615	Status Valid
Class A Commercial	Phone No.			Class A Commercial	Phone No.		
DL State IA	Endorsement None	Restriction None		DL State MN	Endorsement M - Motorcycle, N - Tanker	Restriction None	
Jurisdiction State	Recommendations? None			Jurisdiction State	Recommendations? None		
Physical Conditions Apparently Normal (Including No Drugs/Alcohol)				Physical Conditions Apparently Normal (Including No Drugs/Alcohol)			
<input checked="" type="checkbox"/> Address Correct				<input checked="" type="checkbox"/> Address Correct			
<input checked="" type="checkbox"/> Violations				<input type="checkbox"/> Violations			
<input checked="" type="checkbox"/> CMV	Vehicle Year 2016	Vehicle Make KENWORTH	VIN 1XKYUP9X3QJ124544	<input type="checkbox"/> CMV	Vehicle Year 2006	Vehicle Make STERLING	VIN 2FZA4HQA66AV67305
Vehicle Model T660	Vehicle Color RED			Vehicle Model STE	Vehicle Color ORANGE		
# of Passengers	Tag # SC2559	State IOWA	Plate County Year Registered 2017	# of Passengers	Tag # ET6076	State MINNESOTA	Plate County Year Registered 2017
Parked Status	Insurance Co. SCOTTSDALE INS CO			Parked Status	Insurance Co. SELF INSURED		
	Policy No LFOC002967				Policy No 1046		
<input type="checkbox"/> Vehicle Fire	Towed Towed Due to Disabling Damage	Towing Company GLENN'S TOWING		<input type="checkbox"/> Vehicle Fire	Towed Not Towed	Towing Company	
<input checked="" type="checkbox"/> Pulling Unit				<input type="checkbox"/> Pulling Unit			
Point of Initial Contact FRONT	Most Harmful Event MOTOR VEHICLE IN TRANSPORT			Point of Initial Contact REAR	Most Harmful Event MOTOR VEHICLE IN TRANSPORT		
Vehicle Maneuver MOVING FORWARD	Sequence of Events MOTOR VEHICLE IN TRANSPORT			Vehicle Maneuver MOVING FORWARD	Sequence of Events MOTOR VEHICLE IN TRANSPORT		
Vehicle Type MEDIUM / HEAVY TRUCKS (MORE THAN 10,000LBS)	RAN OFF ROADWAY LEFT			Vehicle Type OTHER			
Vehicle Use NORMAL				Vehicle Use NORMAL			
Emergency Use	Vehicle Factors TOO FAST FOR CONDITIONS			Emergency Use	Vehicle Factors NO CLEAR CONTRIBUTING FACTOR		
Contributing Factors DRIVER SPEEDING FOLLOWING TOO CLOSELY	Distracted Driving NOT DISTRACTED			Contributing Factors NO CLEAR CONTRIBUTING ACTION	Distracted Driving NOT DISTRACTED		
	Speeding TOO FAST FOR CONDITIONS				Speeding NOT SPEEDING		
Ped Maneuver	<input type="checkbox"/> Alcohol Suspected <input type="checkbox"/> Drug Suspected			Ped Maneuver	<input type="checkbox"/> Alcohol Suspected <input type="checkbox"/> Drug Suspected		
Tested No, Test Not Given	Type	Results		Tested No, Test Not Given	Type	Results	
Tested No, Test Not Given	Type	Results		Tested No, Test Not Given	Type	Results	
Direction of Travel NORTHBOUND	Alignment STRAIGHT	Roadway Grade UPHILL	Posted Speed 70	Direction of Travel NORTHBOUND	Alignment STRAIGHT	Roadway Grade UPHILL	Posted Speed 70
Traffic Design 2+1, 2+1, 2+1, 2+1	Traffic Ctrl Status	Traffic Ctrl NOT APPLICABLE	Number of Lanes 4	Traffic Design 2+1, 2+1, 2+1, 2+1	Traffic Ctrl Status	Traffic Ctrl NOT APPLICABLE	Number of Lanes 4

Report By

TROOPER Erola, Brian

Badge # Department

101 MSP/2100

Created Date

1/10/2017

Submitted By

1672

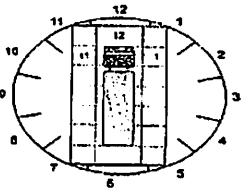
Checked By

Buck, Brian

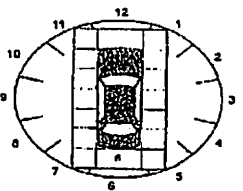
Date Checked

1/10/2017

Unit 1

Carrier Name DON HUMMER TRUCKING INC			
I.D.O.T. # 307512			
Address	City	State	Zip
1486 HWY 6 NW	OXFORD	IA	52322
G.V.W.R	Cargo Body Type		
MORE THAN 26,000 LBS	VAN/ENCLOSED BOX		
Vehicle Config.			
TRUCK TRACTOR/SEMI-TRAILER			
Carrier Type		Bus Service Type	
INTERSTATE CARRIER			
<input type="checkbox"/> Vehicle Placarded Hazardous	HazMat Id	HazMat Name	Class #
<input type="checkbox"/> Material Released Inspection			
<input type="checkbox"/> Waived	Inspection Number	Inspector Badge Id #	
	MN00ZDD00112	1602	
<input type="checkbox"/> Top			
<input type="checkbox"/> Undercarriage			
<input type="checkbox"/> All Areas			
<input type="checkbox"/> Unknown			
Extent of Damage			
Severe - Disabling			

Unit 2

<input type="checkbox"/> Top	
<input type="checkbox"/> Undercarriage	
<input type="checkbox"/> All Areas	
<input type="checkbox"/> Unknown	
Extent of Damage	
Moderate - Functional	

<b>Crash Type</b> Motor Vehicle in Transport	<b>Weather</b> Snow Blowing Sand/Soil/Dirt/Snow	<b>Light Cond.</b> Daylight	<b>\$1000+ In Damage</b> Yes	<b>Bus Inv.</b> No	<b>Road Surface</b> Ice/Frost	<b>Road Circumstances</b> Road Surface Condition (wet, icy, snow, slush, etc.)
<b>Manner of Collision</b> Front to Rear	<b>Photos Taken</b> No	<b>On Bridge</b> No	<b>Ownership of Land</b> Public Property	<b>Roadway Direction</b> North	<b>On/Off Trafficway</b> Trafficway, On Road	<b>Location Relative to Trafficway</b> On Roadway (including alley, driveway, etc.)
<b>Location Relative to Intersection</b> Entrance/Exit Ramp	<b>Near/In Work Zone</b> No	<b>Type of Work Zone</b> NOT APPLICABLE	<b>Location Relative to Work Zone</b>	<b>Workers Present</b>	<b>L.E. Present</b>	

VEH #	Last Name, First, Middle	Person Type	Position	DOB	Sex
1	WELCH, JOSEPH WILLIAM	Driver	Driver (Include Motorcycle Driver)	1/23/1988	M

Eject	Airbag Use	Injury	Transported	Ambulance Service	Run#	Restraint Type And Use
Not Ejected or Trapped	Not Applicable	No Apparent Injury				Lap and Shoulder Belt Used

VEH #	Last Name, First, Middle	Person Type	Position	DOB	Sex
2	LUDWIG, DANIEL JOHN	Driver	Driver (Include Motorcycle Driver)	8/7/1970	M

Eject	Airbag Use	Injury	Transported	Ambulance Service	Run#	Restraint Type And Use
Not Ejected or Trapped	Not Applicable	No Apparent Injury				Lap and Shoulder Belt Used

VEH #	Last Name, First, Middle	Address	City	State	County	Zip
1	DON HUMMER TRUCKING CORP	1485 HWY 6 NW	OXFORD	IA		52322

Person Type	<input type="checkbox"/> Same as Driver	Phone No.
NER		

VEH #	Last Name, First, Middle	Address	City	State	County	Zip
2	MINN, DEPT OF	6000 MINNEHAHA AV S	ST PAUL	MN		551110002

Person Type	<input type="checkbox"/> Same as Driver	Phone No.
OWNER		

Witness Name	DOB	Sex	Phone No.

VEH 1 NB Isth 35 IN THE LEFT LANE AT ABOUT THE 57 MILE MARKER AT ABOUT 55-60 MPH. DRIVER OF VEH 1 STATED HE COULD SEE THE FLASHING LIGHTS AHEAD OF HIM THE LEFT LANE. DRIVER STATED THERE WAS A LARGE CLOUD OF SNOW AND COULDN'T SEE THE VEH, SO HE SLOWED DOWN. VEH 1 STRUCK VEH 2 FROM BEHIND. VEH 1 DROVE DOWN INTO THE LEFT MEDIAN, AND VEH 2 CAME TO A REST ON THE RIGHT SHOULDER. HEAVY FRONT END DAMAGE TO VEH 1, AND DAMAGE TO THE REAR SANDER OF THE MNDOT PLOW. NO INJURIES REPORTED AT THE SCENE. VEH 1 TOWED FROM THE SCENE BY GLENN'S TOWING. WELCH CITED FOR FOLLOWING TOO CLOSE.

